

EXHIBIT B

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS

Plaintiff,

-vs-

THE MIDDLE EAST FORUM,
DANIEL PIPES (*individually*),
GREGG ROMAN (*individually*), and
MATTHEW BENNETT (*individually*)

Defendants.

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CIVIL ACTION NO. 2:19-cv-05030-JDW

**DECLARATION OF JONATHAN R. CAVALIER IN SUPPORT OF
DEFENDANTS' PETITION FOR ATTORNEYS' FEES AS SET FORTH IN
THE COURT'S NOVEMBER 13, 2020 ORDER**

In support of the Petition for Attorneys' Fees as Set Forth in the Court's November 13, 2020 Order, the undersigned Jonathan R. Cavalier declares as follows:

1. I am a member of Cozen O'Connor's Labor and Employment Department with more than 13 years of experience in labor and employment litigation. I have substantial trial experience, including as first-chair in state and federal jury trials, and was recently named a "BTI Client Service All-Star" - one of only 49 labor and employment lawyers featured on this prestigious, national list based on candid feedback from corporate counsel at nearly 300 Fortune 1000 companies, and which recognizes lawyers who demonstrate superior client focus, have an exceptional ability to understand their client's business, consistently exceed clients' expectations, possess excellent legal skills and depth of knowledge, and deliver outstanding results. I hold a J.D. from Temple University Law School and an MBA from Temple's Fox School of Business. I represent The Forum, Daniel Pipes and Gregg Roman in the above-captioned matter. My regular hourly rate for matters of this type is \$500 per hour, but my contracted rate on this case is \$340/hr.

2. In addition to the time entries set forth in the Forum's Petition and the Certification of David J. Walton, on November 19 and 20, 2020, I spent an additional 3.6 hours drafting the instant fee petition, collecting and analyzing the supporting documentation, performing necessary research, revising the petition and preparing it for filing.

3. Pursuant to 28 U.S.C. 1746, I attest under penalty of perjury that the foregoing is true and accurate to the best of my knowledge.

Respectfully submitted,

COZEN O'CONNOR

BY: /s/Jonathan R. Cavalier

Jonathan R. Cavalier (PA #206063)

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Dated: November 20, 2020